

EXHIBIT 1

Declaration of HSI Special Agent
Christopher Moriarty

MCC:LS
F. #2024R00485

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

Docket No. 24-CR-521 (GRB)

JACOB ISRAEL WALDEN,

Defendant.

----- X

I, Christopher Moriarty, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct:

1. I am a Special Agent with Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”). I am currently assigned to the Child Exploitation Investigative Group in Newark, New Jersey. I am a co-case agent (with Special Agent Jaclyn Duchene) assigned to the prosecution of the defendant Jacob Walden.
2. I have been employed by DHS since March 2009, and I have been a Special Agent with HSI since September 2018. Through my employment, I have received training in the area of child pornography, as defined in 18 U.S.C. § 2256, and child exploitation, and have, as part of my daily duties as a Special Agent, investigated violations relating to child exploitation and child pornography, including violations pertaining to the possession, distribution, receipt, advertising, and production of child pornography, in violation of 18 U.S.C. §§ 2251, 2252(a), and 2252A. As part of my duties as a Special Agent, I have observed and reviewed numerous examples of child pornography in all forms of media, including computer media. I have also participated in the execution of many search warrants, including searches involving child exploitation and/or child pornography offenses.

3. Since March 2022, I have served as the case agent investigating a large-scale child pornography production and distribution scheme led by Ryan Edward Hine. Together with my colleagues at HSI, I worked to identify the participants in the scheme including: (i) the producers and distributors; (ii) the buyers; and (iii) the minor victims.
4. In September 2023, based on electronic payment records obtained from Cash App, I formally identified Walden as a suspected purchaser of child pornography from the production and distribution scheme led by Hine. As an investigative step, I created a “subject record” for Walden in HSI’s computer-based reporting system. The opening of the subject record generated alerts about the Walden’s travel, which I received as the case agent.
5. When I created the subject record, I did not believe that I had probable cause to arrest Walden. Based on my training in the area of child pornography and my experience investigating offenses relating to child exploitation and child pornography, a repeat purchaser of child pornography is a collector who does not cease after several purchases. Based on the electronic payment records from Cash App, I had a strong suspicion that Walden possessed child pornography.
6. After learning of Walden’s international trip scheduled for April 21, 2024, I decided to inspect his person and property at John F. Kennedy International Airport, in my capacity as a customs officer, to determine if Walden was in possession of contraband (child pornography) that he was taking over the international border.
7. I recorded the circumstances of the border inspection of April 21, 2024 in a DHS report of investigation, which I understand has been produced to Walden in discovery.
8. Following the border inspection, I received email correspondence from Saul Bienenfeld, Esq., counsel for Walden. A true and correct copy of the correspondence is attached.
9. I reviewed the forensic extraction of Walden’s cell phone after it was ready on or about May 1, 2024. The review confirmed the presence of images and videos containing child pornography. Additionally, I identified multiple conversations involving the production, distribution, receipt of images and videos of possible child pornography.
10. In May 2024, I served DHS summonses on Block (the corporate owner of Cash App), Mega (a company that provides encrypted cloud-based storage and file hosting services), and Snapchat (a social media company).

11. In May 2024, I worked to identify the victims pictured in the images and videos containing child pornography that were identified on Walden's cell phone.
12. By June 2024, I contacted HSI colleagues in Arkansas to attempt to interview the first victim whom I was able to identify in the child pornography recovered from the defendant's cell phone.
13. In July 2025, I conferred with ICE's Office of the Principal Legal Advisor concerning border search authority.

Executed on June 1, 2025

Christopher Moriarty

Christopher Moriarty

ATTACHMENT A

From: Saul Bienenfeld <saul@bienenfeldlaw.com>
Sent: Thursday, July 11, 2024 4:26 PM
To: Moriarty, Christopher B
Subject: Re: Jake Walden

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click [here](#) and follow instructions.

Dear Agent Moriarty

Can you please inform me if you still need my clients phone and if not how can he go about getting it back.

Thanks

Saul Bienenfeld

On Apr 22, 2024, at 10:16 AM, Moriarty, Christopher B
<christopher.b.moriarty@ice.dhs.gov> wrote:

Good Morning Mr. Bienenfeld,

In an abundance of caution and with respect to any individual's rights, further documentation of your legal representation is required to discuss any further matter.

Additionally, please review 19 USC §§ 482, 507, 1461, 1496, 1581, 1589(a), 1595a(d) and other pertinent provisions of customs laws and regulations to gain more information about customs officials' legal authority to conduct inspections and searches of merchandise and persons at the functional equivalent of the border.

Respectfully,

Chris Moriarty
Special Agent
Homeland Security Investigations
620 Frelinghuysen Avenue
Newark, NJ 07114

Cell: [REDACTED]

<image004.png>

From: Saul Bienenfeld <saul@bienenfeldlaw.com>
Sent: Sunday, April 21, 2024 11:50 AM

To: Moriarty, Christopher B <christopher.b.moriarty@ice.dhs.gov>

Subject: Jake Walden

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click [here](#) and follow instructions.

Please be advised that this firm will be representing Jake Walden. I have been informed that you seized his phone at JFK. I am requesting that you do not search his phone without the benefit of a warrant and if you have one that you send me a copy ASAP.

I can be reached at

[REDACTED]

Saul Bienenfeld

<image003.jpg>

Saul Bienenfeld
680 Central Ave
Suite 108
Cedarhurst, NY 11516
212-363-7701